

1 S. BRENT VOGEL  
Nevada Bar No. 006858  
2 [Brent.Vogel@lewisbrisbois.com](mailto:Brent.Vogel@lewisbrisbois.com)  
ETHAN M. FEATHERSTONE  
3 Nevada Bar No. 11566  
[Ethan.Featherstone@lewisbrisbois.com](mailto:Ethan.Featherstone@lewisbrisbois.com)  
4 LEWIS BRISBOIS BISGAARD & SMITH LLP  
6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
Telephone: 702.893.3383  
6 Facsimile: 702.893.3789

7 *Attorneys for Defendant*  
8 *Sweet Home Belmont, LLC*

9 DISTRICT COURT  
10 CLARK COUNTY, NEVADA

12 VALARIE SOTO; an individual,,

13 Plaintiff,

14 vs.

15 INFINITY HOSPICE CARE, LLC; an  
Arizona limited liability company, NEVADA  
16 HOSPICE AND PALLIATIVE CARE, INC.,;  
a Nevada corporation, INFINITY HOSPICE  
17 CARE OF LAS VEGAS, LLC, a Nevada  
limited liability company, INFINITY  
18 HOSPICE CARE OF RENO, LLC; a Nevada  
limited liability company, SWEET HOME  
19 BELMONT, LLC; a Nevada limited liability  
company, DOES 1-X; ROE  
20 CORPORATIONS AND/OR ENTITIES I-X,

21 Defendant.

Case No. 2:22-cv-0632-BNW

**AMENDED JOINT PROPOSED  
DISCOVERY PLAN AND SCHEDULING  
ORDER**

22 Pursuant to Local Rules (“LR”) 16-1, and 26-1(b), and 26-2, and 26-3, and Federal Rules  
23 of Civil Procedure (“FRCP”) 16.1 and 26, VALARIE SOTO (“Plaintiff”) and DEFENDANT  
24 SWEET HOME BELMONT, LLC (“Defendant”) (Plaintiff and Defendant collectively referred to  
25 hereafter as the “Parties”) and this Court’s Order [ECF No. 108], , by and through their respective  
26 counsel, submit this Amended Joint Proposed Discovery Plan and Scheduling Order.  
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1                   **1. Meeting of the Parties**

2                   On January 7, 2025, Paul S. Padda, Esq. and Eric Larsen, Esq (on behalf of the Plaintiff)  
3 and Ethan Featherstone, Esq. (on behalf of Defendant Sweet Home Belmont) conferred via email  
4 regarding this proposed Amended Joint Proposed Discovery Plan and Scheduling Order, pursuant  
5 to FRCP 26(f). The attached plan accords with relevant federal and local rules, that the Parties  
6 request a 180-day discovery plan.

7                   **2. Initial Disclosures:**

8                   Initial disclosures have been disclosed. The Parties have supplemented disclosures and are  
9 expected to provide additional supplemental disclosures consisting of relevant materials and  
10 information in the Parties' possession and will comply with FRCP 26(a)(1).

11                   **3. Subjects on which discovery may be needed:**

12                   Discovery will be conducted on all issues relevant to the Parties' respective claims and  
13 defenses, including the operations of Sweet Home, the condition of Ms. Mactier in April 2020,  
14 why and how she was admitted as a resident at that time, and the cause of her death.

15                   **4. Discovery Plan:**

16                   Local Rule 26-1(b)(1) provides that "unless otherwise ordered, discovery periods longer  
17 than one hundred and eighty (180) days from the date the first defendant answers or appears  
18 will require special scheduling review." Special scheduling review is needed in this case  
19 because this proposed plan is being submitted well after the first defendant appeared. However,  
20 there have been at least two periods in which this case has been stayed. The discovery deadline  
21 proposed is approximately 180 days from the date of the parties discussion on January 7, 2025.

22                   The parties respectfully request the Court approve the deadlines proposed below:

23                   Amend or Add Parties	April 9, 2025
24                   Initial Expert Disclosures	May 9, 2025
25                   Rebuttal Expert Disclosures	June 6, 2025
26                   Discovery	July 8, 2025
27                   Dispositive Motions	August 7, 2025

1           **A. Pretrial Order:** The Parties shall file a joint pretrial order no later than thirty  
 2           days after the date set for filing dispositive motions. In the event dispositive  
 3           motions are filed, the date for filing the joint pretrial order shall be suspended  
 4           until thirty days after the Court issues an Order on any dispositive motions. If  
 5           dispositive motions are filed, the deadline for filing a joint pretrial order will be  
 6           suspended until 30-days after a decision on the motion is rendered or until  
 7           further court notice. *See* Local Rule 26-1(b)(5).

8           **B. FRCP 26(a)(3) Disclosures:** The disclosures required by FRCP 26(a)(3) shall  
 9           be made in the joint pretrial order, including any objections thereto.

10           **5. Alternative Dispute Resolution:**

11           The parties hereby certify that they discussed the possibility of resolution of this case  
 12           through means of alternative dispute resolution (i.e. arbitration, mediation, early neutral  
 13           evaluation). The parties believe that mediation will be potentially useful after the close of  
 14           discovery.

15           **6. Alternative Forms of Case Disposition:**

16           The Parties certify that they considered consent to trial by a magistrate judge under 28  
 17           U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order  
 18           2013-01). The parties already consented to have the assigned United States Magistrate Judge  
 19           preside over this matter for all purposes. *See* ECF No. 23. The parties do not consent to the Short  
 20           Trial Program; the parties filed their demands for trial by jury. *See* ECF No. 39 and 77.

21           **7. Electronic Evidence:**

22           The parties, by and through their respective counsel, certify that they communicated  
 23           regarding the issue of whether they intend to present evidence in electronic format to jurors for  
 24           the purpose of jury deliberations. At this time, the parties have not made any stipulations  
 25           regarding providing discovery in an electronic format compatible with the Court's electronic  
 26           jury evidence display system.

27           //

28           //

1  
2 Dated this 14<sup>th</sup> day of January 2025.

3 /s/ Ethan M. Featherstone

4 Ethan M. Featherstone, Esq.

5 Nevada Bar No. 11566

6 S. Brent Vogel, Esq.

7 Nevada Bar No. 006858

8 LEWIS BRISBOIS BISGAARD & SMITH,  
9 LLP

10 6385 South Rainbow Blvd., Suite 600

11 Las Vegas, Nevada 89102

12 Tele. (702) 893-3383

13 *Attorneys for Defendant*

14 *Sweet Home Belmont, LLC*

Dated this 14<sup>th</sup> day of January 2025.

/s/ Eric Larsen

Eric Larsen, Esq.

Nevada Bar No. 9423

PAUL PADDA LAW, PLLC

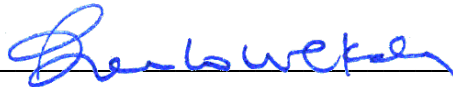
4560 South Decatur Blvd., Ste. 300

Las Vegas, Nevada 89103

Tele. (702) 366-1888

*Attorneys for Plaintiff Valarie Soto*

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17 **IT IS SO ORDERED:**

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28 **UNITED STATES MAGISTRATE JUDGE**

**DATED:** January 15, 2025